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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,	)	No. CR-11-00742 SBA
	)	
Plaintiff,	)	STIPULATED REQUEST TO CONTINUE
	)	HEARING DATE TO DECEMBER 12,
v.	)	2011 AND TO EXCLUDE TIME UNDER
	)	THE SPEEDY TRIAL ACT AND
	)	[PROPOSED] ORDER
VISHAL DASA,	)	
ANJI REDDY DIRISINALA,	)	
RAMAKRISHNA REDDY KARRA, and	)	Hearing Date: November 7, 2011
TUSHAR TAMBE	)	Time: 10:00 a.m.
	)	
Defendants.	)	
	)	
	)	

The above-captioned matter is set on November 7, 2011 before this Court for a status hearing. The parties jointly request that the Court continue the matter to December 12, 2011, at 10:00 a.m., before this Honorable Court, and that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161, between November 7, 2011 and December 12, 2011, so that the defense can have more time to review and assess the discovery in this case.

On October 7, 2011, the United States Attorney filed a one-count Information charging defendants with conspiracy to commit visa fraud in violation of 18 U.S.C. §§ 371 and 1546(a). On October 11, 2011, the defendants appeared before the magistrate court, waived Indictment and were arraigned. Defendants face a maximum sentence of five years imprisonment on this

1 charge.

2 By way of background, this case is related to a larger investigation involving Tri-Valley  
3 University ("TVU"), which the government has alleged was a sham university that accepted  
4 foreign students and issued legal status for these students without requiring that they attend  
5 classes. *See* Indictment in *United States v. Susan Su*, CR 11-00288-SBA. The upcoming status  
6 date would be the first district court appearance for the four charged defendants in this related  
7 case.

8 The defense requests additional time to review the discovery that the government has  
9 already produced, which includes voluminous files from TVU computers that the government  
10 seized and that the defendants need to review. Additionally, the defense has requested that the  
11 government produce additional discovery relating to the broader investigation in this case, and  
12 the government has agreed to produce this discovery to defense counsel. For these reasons, the  
13 defense requests additional time to review the discovery and to assess this case, and the parties  
14 agree that this is an appropriate reason to continue this case until December 12, 2011.

15 The parties stipulate and agree that the ends of justice served by this continuance  
16 outweigh the best interest of the public and the defendants in a speedy trial. The parties further  
17 agree that the failure to grant this continuance would unreasonably deny counsel for defendants  
18 the reasonable time necessary for effective preparation, taking into account the exercise of due  
19 diligence. Accordingly, the parties agree that the period of time from November 7, 2011 until  
20 December 12, 2011, should be excluded in accordance with the provisions of the Speedy Trial  
21 Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), for effective preparation of defense counsel, taking  
22 into account the exercise of due diligence.

23 DATED: November 2, 2011

\_\_\_\_\_  
/S/  
WADE M. RHYNE  
HARTLEY M.K. WEST  
Assistant United States Attorneys

1 DATED: November 2, 2011

/S/  
KENNETH MCGUIRE  
Counsel for Tushar Tambe

3 DATED: November 2, 2011

/S/  
GINNY H.K. WALIA  
Counsel for Ramakrishna Reddy Karra

6 DATED: November 2, 2011

/S/  
GALIA AMRAM PHILLIPS  
Counsel for Anji Reddy Dirisinala

8 DATED: November 2, 2011

/S/  
ANGELA M. HANSEN  
Assistant Federal Public Defender  
Counsel for Vishal Dasa

**ORDER**

Based on the reasons provided in the stipulation of the parties above, the Court hereby  
FINDS:

1. Given that this case is related to a larger investigation involving Tri-Valley University and the Indictment in *United States v. Susan Su*, CR 11-00288-SBA, and that the government produced discovery to defendants that includes voluminous computer files from the University that the defense needs to review;

2. Given that the defense has requested additional discovery and that the government has agreed to produce this discovery to the defense;

3. Given that a complete review of the discovery is necessary to the defense preparation of the case and that the failure to grant the requested continuance would unreasonably deny counsel for defendants the reasonable time necessary for effective preparation, taking into account the exercise of due diligence;

4. Given that the ends of justice served by this continuance outweigh the best interest of the public and the defendants in a speedy trial;

Based on these findings, IT IS HEREBY ORDERED that the STATUS date of November 7, 2011, scheduled at 10:00 a.m., before the Honorable Sandra Brown Armstrong, is vacated and reset for December 12, 2011, at 10:00 a.m. It is FURTHER ORDERED that time is excluded pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) and (B)(iv), from November 7, 2011 until December 12, 2011.

DATED: \_\_\_\_\_

\_\_\_\_\_  
SAUNDRA BROWN ARMSTRONG  
United States District Judge